

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

**PINNACLE PACKAGING  
COMPANY, INC.,**  
an Oklahoma corporation,  
**POLO ROAD LEASING, LLC,**  
an Oklahoma limited liability company,  
and  
**J. SCOTT DICKMAN,**

Plaintiffs,

v.

**CONSTANTIA FLEXIBLES GmbH,** an  
Austrian corporation, and  
**ONE EQUITY PARTNERS (EUROPE)  
GmbH**

Defendants.

Case No. 4:12-CV-00537-JED-TLW

**DECLARATION OF KARIN GEISSEL**

Pursuant to 28 U.S.C. § 1746, Karin Geissel declares as follows:

1. I am Counsel in the law firm Freshfields Bruckhaus Deringer, LLP, attorneys for Defendants Constantia Flexibles GmbH (“Constantia”) and One Equity Partners (Europe) GmbH (“OEP Europe,” and together with Constantia, “Defendants”). I submit this Declaration in support of Defendants’ motion for a protective order (the “Motion”) related to Plaintiffs’ deposition notices of OEP Europe and Thomas Unger filed in the above-captioned lawsuit.

2. I am admitted to practice law in Germany and in California. I currently practice law in Munich, Germany. Prior to joining Freshfields Bruckhaus Deringer in 2010, I was a partner at a litigation firm in San Francisco, where my litigation practice focused on the representation of German and European companies.

3. There is a practice to allow for U.S.-style depositions in Germany with regard to German nationals if the German Ministry of Justice is informed and approves the deposition in advance, which, in my opinion, it usually does.

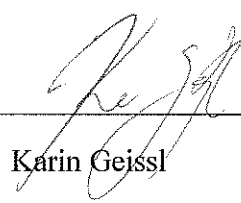
4. In order to provide parties to cross-border disputes with the opportunity to take depositions in Germany, the Consulate General of the United States in Frankfurt specifically provides instructions for the proper process on its webpage. (See <http://germany.usembassy.gov/english-speaking-services/2008-deposition-instructions.pdf>, attached to the Declaration of Scott Dickman dated July 7, 2015 as Exhibit A-3).

5. In my opinion, the use of a court reporter and videographer during such deposition would be permissible, so long as all parties agree to it. The U.S. Consulate General's webpage specifically provides a list of court reporters, videographers and interpreters for U.S.-style depositions in Germany. (See Exhibit A-3 to the Declaration of Scott Dickman).

6. During my litigation practice in the United States, depositions of foreign witnesses in U.S. litigation matters were taken outside the United States in several of my former law firm's cases.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Munich, Germany  
July 20, 2015

  
Karin Geissl